

**Exhibit A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

The Hertz Corporation, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-11218 (MFW)

(Jointly Administered)

Re: **D.I.** \_\_\_\_\_

**ORDER SUSTAINING REORGANIZED DEBTORS' TWENTY-FIRST OMNIBUS  
(NON-SUBSTANTIVE) OBJECTION TO FALSE POLICE REPORT CLAIMANTS'  
(I) AMENDED AND SUPERSEDED CLAIMS, (II) DUPLICATIVE CLAIMS,  
AND (III) LATE CLAIMS**

Upon the *Reorganized Debtors' Twenty-First Omnibus (Non-Substantive) Objection to False Police Report Claimants' (I) Amended and Superseded Claims, (II) Duplicative Claims, and (III) Late Claims* (the “**Objection**”),<sup>2</sup> of the reorganized debtors (collectively, the “**Reorganized Debtors**” and, prior to the Effective Date, the “**Debtors**”), in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), pursuant to Bankruptcy Code sections 105 and 502, Bankruptcy Rule 3007, and Local Rule 3007-1; and the Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware*, dated as of February 29, 2012; and consideration of the Objection and the relief requested therein being a core proceeding in accordance with 28 U.S.C. § 157(b)(2); and venue being proper in this

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<sup>1</sup> The last four digits of The Hertz Corporation's tax identification number are 8568. The location of the Reorganized Debtors' service address is 8501 Williams Road, Estero, FL 33928. The Chapter 11 Cases are jointly administered for procedural purposes, and a complete list of the Reorganized Debtors and the last four digits of their federal tax identification numbers may be obtained on the website of the Reorganized Debtors' claims and noticing agent at <https://restructuring.primeclerk.com/hertz>.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Objection.

District pursuant to 28 U.S.C. §§ 1408 and 1409; and notice of the Objection being adequate and appropriate under the particular circumstances; and the Court having considered the Martin Declaration and found and determined that the relief sought in the Objection is in the best interests of the Reorganized Debtors, the Reorganized Debtors' estates and creditors, and other parties in interest and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED THAT:**

1. The Objection is sustained as provided herein.
2. Any Response to the Objection not otherwise withdrawn, resolved, or adjourned is overruled on the merits.
3. Each Amended and Superseded Claim listed in the column titled "Amended Claim to be Disallowed" identified on **Schedule 1** hereto is disallowed and expunged in its entirety. The claims listed in the column titled "Remaining Claim" identified on **Schedule 1** hereto shall remain on the Claims Register, subject to the Reorganized Debtors' further objections on any substantive or non-substantive grounds.
4. Each Duplicate Claim listed in the column titled "Duplicate Claim to be Disallowed" identified on **Schedule 2** hereto is disallowed and expunged in its entirety. The claims listed in the column titled "Surviving Claim" identified on **Schedule 2** hereto shall remain on the Claims Register, subject to the Reorganized Debtors' further objections on any substantive or non-substantive grounds.
5. Each Late Claim identified on **Schedule 3** hereto is disallowed and expunged in its entirety.

6. The objection by the Reorganized Debtors to the Disputed Claims as addressed in the Objection and the schedules hereto, constitutes a separate contested matter with respect to each such claim, as contemplated by Bankruptcy Rule 9014 and Local Rule 3007-1. This Order shall be deemed a separate Order with respect to each Disputed Claim.

7. Any stay of this Order pending appeal by any holder of a Disputed Claim or any other party with an interest in such claims that are subject to this Order shall only apply to the contested matter which involves such party and shall not act to stay the applicability or finality of this Order with respect to the other contested matters arising from the Objection or this Order.

8. The Reorganized Debtors, Prime Clerk, and the Clerk of this Court are authorized to modify the official Claims Register for these Chapter 11 Cases in compliance with the terms of this Order and to take all steps necessary or appropriate to carry out the relief granted in this Order.

9. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Reorganized Debtors may have to enforce rights of setoff against the claimants.

10. Nothing in the Objection or this Order, nor any actions or payments made by the Reorganized Debtors pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors under the Bankruptcy Code or other applicable nonbankruptcy law; (b) a waiver of the Reorganized Debtors' or any other party in interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors'

estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

11. This Order is immediately effective and enforceable.

12. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation or enforcement of this Order.

**Schedule 1**

**Amended and Superseded Claims**

The Hertz Corporation, *et al.*

Schedule 1 to Twenty-First Omnibus (Non-Substantive) Objection

#	Name of Claimant	Amended Claim To Be Disallowed				Remaining Claim				Reason For Disallowance
		Date Claim Filed	Claim Number	Debtor Name	Claim Amount <sup>[1]</sup>	Date Claim Filed	Claim Number	Debtor Name	Claim Amount <sup>[1]</sup>	
1	False Police Report Claimants No. 2	10/21/2020	9158	Dollar Thrifty Automotive Group, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15252	Dollar Thrifty Automotive Group, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The "remaining claim" identifies that it amends and supersedes the "amended claim".
2	False Police Report Claimants No. 1	10/20/2020	9595	Hertz Global Holdings, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15247	Hertz Global Holdings, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The "remaining claim" identifies that it amends and supersedes the "amended claim".
3	False Police Report Claimants No. 1	10/21/2020	10760	Rental Car Group Company, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15267	Rental Car Group Company, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The "remaining claim" identifies that it amends and supersedes the "amended claim".
4	False Police Report Claimants No. 1	10/21/2020	10768	Thrifty Rent-A Car System, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15270	Thrifty Rent-A Car System, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The "remaining claim" identifies that it amends and supersedes the "amended claim".
5	False Police Report Claimants No. 1	10/21/2020	10819	Thrifty, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15264	Thrifty, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The "remaining claim" identifies that it amends and supersedes the "amended claim".
6	False Police Report Claimants No. 1	10/21/2020	10823	Dollar Thrifty Automotive Group, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15263	Dollar Thrifty Automotive Group, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The "remaining claim" identifies that it amends and supersedes the "amended claim".
7	False Police Report Claimants No. 2	10/21/2020	10844	Thrifty, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15253	Thrifty, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The "remaining claim" identifies that it amends and supersedes the "amended claim".
8	False Police Report Claimants No. 1	10/20/2020	10960	The Hertz Corporation	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15260	The Hertz Corporation	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The "remaining claim" identifies that it amends and supersedes the "amended claim".
9	False Police Report Claimants No. 1	10/21/2020	11024	Dollar Thrifty Automotive Group Canada Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15258	Dollar Thrifty Automotive Group Canada Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The "remaining claim" identifies that it amends and supersedes the "amended claim".
10	False Police Report Claimants No. 2	10/21/2020	11048	Dollar Rent A Car, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15251	Dollar Rent A Car, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The "remaining claim" identifies that it amends and supersedes the "amended claim".

**Notes:**

[1] S = Secured; A = Administrative; P = Priority; U = Unsecured; T = Total.

**The Hertz Corporation, et al.**

Schedule 1 to Twenty-First Omnibus (Non-Substantive) Objection

#	Name of Claimant	Amended Claim To Be Disallowed				Remaining Claim				Reason For Disallowance
11	False Police Report Claimants No. 2	10/21/2020	11170	Hertz Global Holdings, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15280	Hertz Global Holdings, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The "remaining claim" identifies that it amends and supersedes the "amended claim".
12	False Police Report Claimants No. 1	10/21/2020	11182	Rental Car Intermediate Holdings, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15272	Rental Car Intermediate Holdings, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The "remaining claim" identifies that it amends and supersedes the "amended claim".
13	False Police Report Claimants No. 2	10/21/2020	11194	Thrifty Rent-A-Car System, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15271	Thrifty Rent-A-Car System, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The "remaining claim" identifies that it amends and supersedes the "amended claim".
14	False Police Report Claimants No. 2	10/21/2020	11297	Dollar Thrifty Automotive Group Canada Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15254	Dollar Thrifty Automotive Group Canada Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The "remaining claim" identifies that it amends and supersedes the "amended claim".
15	False Police Report Claimants No. 2	10/21/2020	11306	The Hertz Corporation	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15246	The Hertz Corporation	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The "remaining claim" identifies that it amends and supersedes the "amended claim".
16	False Police Report Claimants No. 2	10/21/2020	11586	Rental Car Group Company, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15259	Rental Car Group Company, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The "remaining claim" identifies that it amends and supersedes the "amended claim".
17	False Police Report Claimants No. 2	10/21/2020	11592	Rental Car Intermediate Holdings, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15275	Rental Car Intermediate Holdings, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The "remaining claim" identifies that it amends and supersedes the "amended claim".

**Notes:**

[1] S = Secured; A = Administrative; P = Priority; U = Unsecured; T = Total.



**Schedule 2**

**Duplicate Claims**

**The Hertz Corporation, et al.**

Schedule 2 to Twenty-First Omnibus (Non-Substantive) Objection

#	Name of Claimant	Duplicate Claim To Be Disallowed				Remaining Claim				Reason For Disallowance
		Date Claim Filed	Claim Number	Debtor Name	Claim Amount <sup>[1]</sup>	Date Claim Filed	Claim Number	Debtor Name	Claim Amount <sup>[1]</sup>	
1	False Police Report Claimants No. 2	10/21/2020	11364	Dollar Thrifty Automotive Group, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	10/21/2020	9158	Dollar Thrifty Automotive Group, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	Claim #11364 is duplicative of Claim #9158.
2	Unknown Class of False Police Report Claimants	10/21/2020	11123	Thrifty Rent-A Car System, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	10/21/2020	10781	Thrifty Rent-A Car System, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	Claim #11123 is duplicative of Claim #10781.
3	False Police Report Claimants No. 3	6/10/2021	15268	Dollar Rent A Car, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	6/10/2021	15265	Dollar Rent A Car, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	Claim #15268 is duplicative of Claim #15265.

**Schedule 3**

**Late Claims**

**The Hertz Corporation, et al.**

## Schedule 3 to Twenty-First Omnibus (Non-Substantive) Objection

#	Name of Claimant	Date Claim Filed	Claim Number	Debtor Name	Claim Amount <sup>[1]</sup>	Reason For Disallowance
1	False Police Report Claimants No. 3	6/10/2021	15245	The Hertz Corporation	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The claim was filed on June 10, 2021. The General Bar Date was October 21, 2020. The claim does not relate back to a claim properly filed before the General Bar Date.
2	False Police Report Claimants No. 3	6/10/2021	15256	Dollar Thrifty Automotive Group, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The claim was filed on June 10, 2021. The General Bar Date was October 21, 2020. The claim does not relate back to a claim properly filed before the General Bar Date.
3	False Police Report Claimants No. 3	6/10/2021	15257	Thrifty, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The claim was filed on June 10, 2021. The General Bar Date was October 21, 2020. The claim does not relate back to a claim properly filed before the General Bar Date.
4	False Police Report Claimants No. 3	6/10/2021	15261	Dollar Thrifty Automotive Group Canada Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The claim was filed on June 10, 2021. The General Bar Date was October 21, 2020. The claim does not relate back to a claim properly filed before the General Bar Date.
5	False Police Report Claimants No. 3	6/10/2021	15265	Dollar Rent A Car, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The claim was filed on June 10, 2021. The General Bar Date was October 21, 2020. The claim does not relate back to a claim properly filed before the General Bar Date.
6	False Police Report Claimants No. 3	6/10/2021	15268	Dollar Rent A Car, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The claim was filed on June 10, 2021. The General Bar Date was October 21, 2020. The claim does not relate back to a claim properly filed before the General Bar Date.
7	False Police Report Claimants No. 3	6/10/2021	15276	Thrifty Rent-A-Car System, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The claim was filed on June 10, 2021. The General Bar Date was October 21, 2020. The claim does not relate back to a claim properly filed before the General Bar Date.
8	False Police Report Claimants No. 3	6/10/2021	15277	Hertz Global Holdings, Inc.	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The claim was filed on June 10, 2021. The General Bar Date was October 21, 2020. The claim does not relate back to a claim properly filed before the General Bar Date.

9	False Police Report Claimants No. 3	6/10/2021	15278	Rental Car Intermediate Holdings, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The claim was filed on June 10, 2021. The General Bar Date was October 21, 2020. The claim does not relate back to a claim properly filed before the General Bar Date.
10	False Police Report Claimants No. 3	6/10/2021	15282	Rental Car Group Company, LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The claim was filed on June 10, 2021. The General Bar Date was October 21, 2020. The claim does not relate back to a claim properly filed before the General Bar Date.
11	False Police Report Claimants No. 1	6/10/2021	15248	Firefly Rent A Car LLC	\$0.00 (S) 0.00 (A) 0.00 (P) 0.00 (U) \$0.00 (T)	The claim was filed on June 10, 2021. The General Bar Date was October 21, 2020. The claim purports to amend a withdrawn claim, and does not otherwise relate back to a claim properly filed before the General Bar Date.